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Attorneys for Defendants
CRUMBL LLC, CRUMBL, IP, LLC, and
CRUMBL FRANCHISING, LLC

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

LISA WATSON, and ANGELA KEERS,
individually and on behalf of all those
similarly situated,

Plaintiffs,

vs.

CRUMBL LLC, CRUMBL, IP, LLC, and
CRUMBL FRANCHISING, LLC,

Defendants.

Case No. 2:23-cv-01770-DJC-CKD

**SECOND JOINT STIPULATION TO
EXTEND TIME TO RESPOND TO
PLAINTIFFS' COMPLAINT; ORDER**

Complaint Filed: August 21, 2023

Judge Daniel J. Calabretta

1 Plaintiffs LISA WATSON and ANGELA KEERS (“Plaintiffs”) and Defendants CRUMBL
2 LLC, CRUMBL IP, LLC, and CRUMBL FRANCHISING, LLC (“Defendants”), by and through
3 their undersigned counsel, and pursuant to Civil Local Rule 144, respectfully submit this
4 Second Joint Stipulation to Extend Time to Respond to Plaintiffs’ Complaint.

5 **WHEREAS**, Plaintiffs filed their Complaint in the above-captioned action (the
6 “Complaint”);

7 **WHEREAS**, on August 23, 2023, Plaintiffs caused the Complaint and Summons to be
8 served on CRUMBL IP, LLC, setting an original deadline for CRUMBL IP, LLC to file its
9 response to the Complaint of September 13, 2023;

10 **WHEREAS**, on August 28, 2023, Plaintiffs caused the Complaint and Summons to be
11 served on CRUMBL FRANCHISING, LLC, setting an original deadline for CRUMBL
12 FRANCHISING, LLC to file its response to the Complaint of September 18, 2023;

13 **WHEREAS**, on September 1, 2023, Plaintiffs caused the Complaint and Summons to
14 be served on CRUMBL LLC, setting an original deadline for CRUMBL LLC to file its response
15 to the Complaint on September 22, 2023;

16 **WHEREAS**, on September 6, 2023, Plaintiffs and Defendants stipulated to a 21-day
17 extension of the earliest deadline to respond to the Complaint by answer or motion, pursuant
18 to Civil Local Rule 144(a), providing Defendants up to and including October 4, 2023 to file and
19 serve their response to Plaintiffs’ Complaint;

20 **WHEREAS**, Plaintiffs and Defendants wish to stipulate to an additional 30-day
21 extension of the October 4, 2023 deadline to respond to the Complaint by answer or motion;

22 **WHEREAS**, good cause exists for this extension because Plaintiffs and Defendants are
23 exploring potential resolution of the case;

24 **WHEREAS**, on September 28, 2023, Plaintiffs and Defendants met and conferred
25 regarding Defendants’ proposed motion in response to Plaintiffs’ Complaint, and during that
26 conference, the parties agreed that further discussions regarding resolution of the case would
27 be productive, and agreed to a short extension to allow those discussions to occur;

28 **WHEREAS**, such stipulation does not alter the date of any event or deadline already
SECOND JOINT STIPULATION TO EXTEND TIME TO RESPOND TO PLAINTIFFS’
COMPLAINT; ORDER

fixed by Court order;

WHEREAS, no dates have yet been set for the discovery cutoff date, the last date for hearing motions, the pre-trial conference date, or the trial date;

NOW, HEREBY, THE PARTIES STIPULATE AND AGREE that Defendants shall have up to and including November 3, 2023 to file and serve their response to Plaintiffs' Complaint.

IT IS SO STIPULATED AND AGREED.

DATED: October 2, 2023

**MILBERG COLEMAN BRYSON PHILLIPS
GROSSMAN LLP**

Alex R. Straus
Erin Ruben
Harper T. Segui
Rachel Soffin

/s/ Erin Rubin (signed with permission received via
email on 9/29/2023)

Erin Rubin
Attorneys for Plaintiffs
LISA WATSON and ANGELA KEERS

DATED: October 2, 2023

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Erik K. Swanholt
Jessica N. Walker
Jordan C. Bledsoe

/s/ Jessica N. Walker

Jessica N. Walker
Attorneys for Defendants
CRUMBL LLC, CRUMBL IP, LLC, and
CRUMBL FRANCHISING, LLC

IT IS SO ORDERED.

DATED: October 2, 2023

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE

SECOND JOINT STIPULATION TO EXTEND TIME TO RESPOND TO PLAINTIFFS'
COMPLAINT; ORDER